

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA**

KATHLEEN KEETER, individually and on :
behalf of all others similarly situated, :

Case No. 1-21-cv-0269-LO-TCB

Plaintiff,

V.

GERBER PRODUCTS COMPANY,

Defendant.

JAMIE MOORE, individually and on behalf of all others similarly situated,

Case No. 1-21-cv-0277-LO-TCB

Plaintiff,

V.

GERBER PRODUCTS COMPANY,

Defendant.

[PROPOSED] CONSOLIDATION ORDER

WHEREAS, there are currently two related putative class actions (captioned above) for violations of various state statutes and common law based on the same facts and issues of law, pending against the same Defendant, and

WHEREAS, entry of this Order will promote judicial economy, avoid duplicative pleadings, motions and discovery proceedings, and streamline adjudication of related matters,

IT IS HEREBY ORDERED THAT:

1. The above actions are hereby consolidated before the Honorable Liam O’Grady, and shall be hereafter identified as *In re Gerber Products Company Heavy Metals Baby Food Litigation*, Master File No. 1:21-cv-0269 (the “Consolidated Action”).

2. Within 45 days of the date of this Order, plaintiffs shall either designate one of the Complaints to serve as the operative complaint for this Consolidated Action or file a Consolidated Complaint.

IT IS SO ORDERED.

Dated: _____, 2021

Honorable Liam O’Grady
United States District Judge